



**JAN 17 2014**

Mr. Jeff Schultz  
ConAgra Foods  
554 S. Yosemite Ave  
Oakdale, CA 95361

**Re: Notice of Minor Title V Permit Modification  
District Facility # N-1976  
Project # N-1133813**

Dear Mr. Schultz:

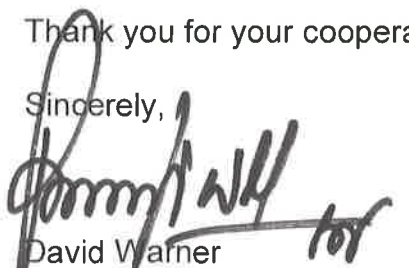
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct N-1976-29-0 into the Title V operating permit. The proposed project is to use a 184 MMBtu/hr boiler until May 2014 while unit under N-1976-4 (196 MMBtu/hr) is being procured.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-1976-29-0, emission increases, and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Rupl Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

  
David Warner  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

## **Title V APPLICATION REVIEW Minor Modification**

**Facility Number:** N-1976  
**Facility Name:** ConAgra Foods  
**Mailing Address:** 554 S. Yosemite Ave  
Oakdale, CA 95361

**Contact Name:** Jeff Schultz  
**Phone:** (209) 840-1146  
**Fax:** (209) 848-7387

**Responsible Official:** Jeff Schultz  
**Title:** Plant Engineering and Environmental Manager

**Processing Staff:** Jag Kahlon  
**Project Number:** N-1133813  
**Date:** January 8, 2014

### **I. PROPOSAL**

ConAgra Foods has proposed to incorporate Authority to Construct (ATC) permit N-1976-29-0 into their Title V operating permit. The ATC permit was issued without Certificate of Conformity (COC). The proposed project is to use a 184 MMBtu/hr boiler until May 2014 while unit under N-1976-4 (196 MMBtu/hr) is being procured.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for permit requirements.

### **II. FACILITY LOCATION**

This facility is located at 554 S. Yosemite Ave, Oakdale, California.

### **III. EQUIPMENT DESCRIPTION**

N-1976-29-1:  
184 MMBTU/HR BABCOCK & WILCOX MODEL FF-16 NATURAL GAS-FIRED BOILER WITH A TODD MODEL RADIAN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) SERVED BY A NBI/CRI (OR EQUIVALENT MANUFACTURER) SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

The proposed project is a Minor Modification to the Title V permit, as the project was not an SB-288 or a Federal Major Modification under Rule 2201. Therefore, public review is not required.

#### **V. APPLICABLE REQUIREMENTS**

Rule 2520    Federally Mandated Operating Permits (6/21/01)

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

ConAgra Foods was issued an ATC to retrofit boiler #4 under permit N-1976-4 with a new burner and a selective catalytic reduction (SCR) system to comply with Rule 4320. The new burner will not be procured until May 2014.

In order to support the facility's operations, ConAgra has decided to use a 184 MMBtu/hr boiler that was previously permitted as a Temporary Replacement Emission Unit (TREU) under ATC N-1976-26-0 until unit N-1976-4 is ready. This boiler has been on site for longer than 180 days and cannot be permitted as a TREU. Therefore, it is being permitted as a new emission unit.

The basis of each requirement in the permit is explained in detail under ATC project N-1133572.

#### **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, the proposed project:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
- b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix IV) ;
2. The source's suggested draft permit (Appendix I); and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix III).

Compliance is expected with this Rule.

#### **APPENDICES**

Appendix I: Proposed Title V Operating Permit No. N-1976-29-1

Appendix II: Authority to Construct N-1976-29-0

Appendix III: Permit Application

Appendix IV: Emissions Change

Appendix I  
Proposed Title V Operating Permit No. N-1976-29-1

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-1976-29-1

**EXPIRATION DATE:** 07/31/2017

**EQUIPMENT DESCRIPTION:**

184 MMBTU/HR BABCOCK & WILCOX MODEL FF-16 NATURAL GAS-FIRED BOILER WITH A TODD MODEL RADIAN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) SERVED BY A NBI/CRI (OR EQUIVALENT MANUFACTURER) SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions from this unit shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. The unit shall only be fired on PUC-quality natural gas with a sulfur content of no greater than 1.0 grains (gr) of sulfur per 100 standard cubic feet (scf) of natural gas. [District Rules 2201 and 4320, 40 CFR 60.42b(k)(1)(2)] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 40 CFR 60.49b(d)(1)] Federally Enforceable Through Title V Permit
5. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
6. The total heat input to the unit shall not exceed 343,328 MMBtu during any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This unit shall not be operated simultaneously with the unit under N-1976-4. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Heat input to this unit shall be counted toward the heat input to boiler under permit N-1976-4. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Duration of each startup and each shutdown shall not exceed 2.0 hours. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit
10. The total duration of startup and shutdown period shall not exceed 4.0 hours in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The total duration of startup and shutdown period shall not exceed 40 hours during any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. During startup and shutdown, NOx emissions shall not exceed 30 ppmvd @ 3% O2 or 0.036 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. During startup and shutdown, CO emissions shall not exceed 61 ppmvd @ 3% O2 or 0.045 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. Except during startup and shutdown, NO<sub>x</sub> emissions shall not exceed 5.0 ppmvd @ 3% O<sub>2</sub> or 0.0062 lb/MMBtu, referenced as NO<sub>2</sub>. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. Except during startup and shutdown, CO emissions shall not exceed 25 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. SO<sub>x</sub> emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. PM<sub>10</sub> emissions shall not exceed 0.005 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. VOC emissions shall not exceed 0.0014 lb/MMBtu, referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NH<sub>3</sub> emissions from the SCR system shall not exceed 10.0 ppmvd @ 3% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
21. Source testing to measure steady state NO<sub>x</sub>, CO and NH<sub>3</sub> emissions shall be conducted within 60 days of initial startup under this permit. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. Source testing to measure NO<sub>x</sub>, CO and NH<sub>3</sub> emissions during steady state operation shall be conducted at least once every 12 months. After demonstrating compliance on 2 consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
30. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
31. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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32. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> at least once during each month in which source testing is not performed. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH<sub>3</sub> monitoring shall be conducted utilizing gas detection tubes (Draeger brand or District approved equivalent). Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. If either the NO<sub>x</sub>, CO or NH<sub>3</sub> concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
34. All NO<sub>x</sub>, CO, O<sub>2</sub> and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO<sub>x</sub>, CO and O<sub>2</sub> analyzer as well as the NH<sub>3</sub> emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
35. Ammonia emissions readings shall be conducted at the time the NO<sub>x</sub>, CO and O<sub>2</sub> readings are taken. The readings shall be converted to ppmvd @ 3% O<sub>2</sub>. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
36. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume and the measured NO<sub>x</sub>, CO and NH<sub>3</sub> concentrations corrected to 3% O<sub>2</sub>, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH<sub>3</sub> emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
37. The permittee shall maintain record of the following items: (1) date; (2) duration of each startup (hours); (3) duration of each shutdown (hours); (4) total start-up and shutdown durations per day (hour/day); (5) total start-up and shutdown durations per month (hours/month); (6) total startup and shutdown duration in a 12 consecutive month period; (7) heat input rate to the unit (MMBtu/month); and (8) total heat input rate to the unit in a 12 consecutive month period. [District Rule 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
38. The owner or operator shall either obtain fuel receipts (such as a valid purchase contract, tariff sheet, or transportation contract) from the fuel supplier that certify that the gaseous fuel meets definition of natural gas (as defined in 40 CFR 60.41b) and the applicable sulfur limit (i.e., 1.0 gr-S/100 scf), or demonstrate that the combusted gas is provided from a PUC or FERC regulated source, or monitor the sulfur content within 60 days of initial startup and weekly thereafter. If the sulfur content is less than or equal to 1.0 gr/100 dscf for eight consecutive weeks, then the monitoring frequency shall be every six months. If the result of any six month monitoring demonstrates that the fuel does not meet the fuel sulfur content limit, weekly monitoring shall resume until compliance is demonstrated for eight consecutive weeks. [District Rule 4320, 40 CFR 60.45b(j), 60.49b(r)(2)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



39. For 40 CFR Part 60 Subpart Db purposes, NO<sub>x</sub> emissions shall not exceed 0.1 lb/MMBtu for low heat release units (70,000 Btu/hr-ft<sup>3</sup> of furnace volume or less) and 0.2 lb/MMBtu for high heat release units (greater than 70,000 Btu/hr-ft<sup>3</sup> of furnace volume) on a 30-day rolling average basis. NO<sub>x</sub> standard shall apply at all times including periods of startup, shutdown, or malfunction. The permittee shall maintain records of the furnace volume, which is defined as the volume bounded by the front furnace wall where the burner is located, the furnace side waterfall, and extending to the level just below or in front of the first row of convection pass tubes [40 CFR 60.44b(a), 60.44b(h), 60.44b(i)] Federally Enforceable Through Title V Permit
40. For the initial compliance test under 40 CFR Part 60 Subpart Db, NO<sub>x</sub> emissions shall be monitored for 30 successive steam generating unit operating days and the 30-day average emission rate shall be used to determine compliance with the NO<sub>x</sub> emission standard under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft<sup>3</sup> of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft<sup>3</sup> of furnace volume)). The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period. [40 CFR 60.46b(e)(1)] Federally Enforceable Through Title V Permit
41. Following the initial compliance test under 40 CFR Part 60 Subpart Db, the operator shall upon request determine compliance with the NO<sub>x</sub> standard under 40 CFR 60.44 (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft<sup>3</sup> of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft<sup>3</sup> of furnace volume)) through the use of a 30-day performance test. During periods when performance tests are not requested, NO<sub>x</sub> emissions data collected pursuant to §60.48b(g)(1) or §60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the NO<sub>x</sub> emission standards. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NO<sub>x</sub> emission data for the preceding 30 steam generating unit operating days. [40 CFR 60.46b(e)(4)] Federally Enforceable Through Title V Permit
42. The owner or operator shall monitor steam generating unit operating conditions and predict NO<sub>x</sub> emission rates as specified in a plan submitted pursuant to 40 CFR §60.49b(c) and approved by the District. [40 CFR 60.48b(g)(2)] Federally Enforceable Through Title V Permit
43. The owner or operator shall submit notification of the date of initial startup and the annual capacity factor at which the owner or operator anticipate to operate this unit. [40 CFR Part 60.49b(a)(3)] Federally Enforceable Through Title V Permit
44. The owner or operator shall submit the data from initial performance test to demonstrate compliance with 40 CFR Part 60 Subpart Db within 60 days after completing the initial test. [40 CFR 60.49b(b)] Federally Enforceable Through Title V Permit
45. The owner or operator shall develop and submit a plan, within 360 days of initial startup of the unit, to predict the hourly NO<sub>x</sub> emissions. The plan shall: (1) Identify the specific operating conditions to be monitored and the relationship between these operating conditions and NO<sub>x</sub> emission rates (i.e., ng/J or lbs/MMBtu heat input). Steam generating unit operating conditions include, but are not limited to, the degree of staged combustion (i.e., the ratio of primary air to secondary and/or tertiary air) and the level of excess air (i.e., flue gas O<sub>2</sub> level); (2) Include the data and information that the owner or operator used to identify the relationship between NO<sub>x</sub> emission rates and these operating conditions; and (3) Identify how these operating conditions, including steam generating unit load, will be monitored under §60.48b(g) on an hourly basis by the owner or operator during the period of operation of the affected facility; the quality assurance procedures or practices that will be employed to ensure that the data generated by monitoring these operating conditions will be representative and accurate; and the type and format of the records of these operating conditions, including steam generating unit load, that will be maintained by the owner or operator under §60.49b(g). If the plan is approved, the owner or operator shall maintain records of predicted nitrogen oxide emission rates and the monitored operating conditions, including steam generating unit load, identified in the plan. [40 CFR Part 60.49b(c)] Federally Enforceable Through Title V Permit
46. The owner or operator shall maintain records of the amount of fuel combusted during each day in this unit. [40 CFR 60.49b(d)(1)] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

47. The owner or operator shall maintain records of the annual capacity factor on a monthly basis. The annual capacity factor shall be determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. [40 CFR 60.49b(d)(1)] Federally Enforceable Through Title V Permit
48. The owner or operator shall maintain records and submit a written report each calendar quarter to the District containing the following information for each steam generating unit operating day: (1) Calendar date; (2) The average hourly NO<sub>x</sub> and CO emission rates (expressed as NO<sub>2</sub>) (ppmvd @ 3% O<sub>2</sub> and lb/MMBtu heat input) measured or predicted; (3) The 30-day average NO<sub>x</sub> emission rates (lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days; (4) Identification of the steam generating unit operating days when the calculated 30-day average NO<sub>x</sub> emission rates are in excess of the NO<sub>x</sub> emissions standards under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft<sup>3</sup> of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft<sup>3</sup> of furnace volume)), with the reasons for such excess emissions as well as a description of corrective actions taken; (5) Identification of the steam generating unit operating days when the average hourly NO<sub>x</sub> and CO emission rates are in excess of the NO<sub>x</sub> and CO limits (startup, shutdown and steady state) in this permit, with the reason for such excess emissions as well as a description of corrective actions taken; (6) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (7) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data; (8) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted; and (11) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080, 2201, 4305, 4306 and 4320, 40 CFR 60.49b(g), 40 CFR 60.49b(i), and 40 CFR 60.49b(w)] Federally Enforceable Through Title V Permit
49. The owner or operator shall maintain all records of required monitoring data and support information for a period of five years from the date of data entry and shall make such records available to the District upon request. [District Rules 1070, 2201, 4305, 4306, and 4320, and 40 CFR 60.49b(o)] Federally Enforceable Through Title V Permit
50. The owner or operator of an affected facility may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 40 CFR 60.49b(v)] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Appendix II  
Authority to Construct N-1976-29-0



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1976-29-0

**ISSUANCE DATE:** 12/12/2013

**LEGAL OWNER OR OPERATOR:** CONAGRA FOODS  
**MAILING ADDRESS:** 554 S YOSEMITE AVE  
OAKDALE, CA 95361

**LOCATION:** 554 S YOSEMITE AVE  
OAKDALE, CA 95361

**EQUIPMENT DESCRIPTION:**

184 MMBTU/HR BABCOCK & WILCOX MODEL FF-16 NATURAL GAS-FIRED BOILER WITH A TODD MODEL RADIANT LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) SERVED BY A NBI/CRI (OR EQUIVALENT MANUFACTURER) SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

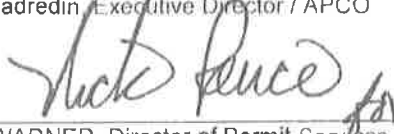
## CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions from this unit shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. The unit shall only be fired on PUC-quality natural gas with a sulfur content of no greater than 1.0 grains (gr) of sulfur per 100 standard cubic feet (scf) of natural gas. [District Rules 2201 and 4320, 40 CFR 60.42b(k)(1)(2)] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 40 CFR 60.49b(d)(1)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services  
N-1976-29-0 Dec 12 2013 1:20PM - KAHLOH Joint Inspection NOT Required

7. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
8. The total heat input to the unit shall not exceed 343,328 MMBtu during any 12 consecutive month rolling period. [District Rule 2201]
9. This unit shall not be operated simultaneously with the unit under N-1976-4. [District Rule 2201]
10. Heat input to this unit shall be counted toward the heat input to boiler under permit N-1976-4. [District Rule 2201]
11. Duration of each startup and each shutdown shall not exceed 2.0 hours. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit
12. The total duration of startup and shutdown period shall not exceed 4.0 hours in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The total duration of startup and shutdown period shall not exceed 40 hours during any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
14. During startup and shutdown, NO<sub>x</sub> emissions shall not exceed 30 ppmvd @ 3% O<sub>2</sub> or 0.036 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. During startup and shutdown, CO emissions shall not exceed 61 ppmvd @ 3% O<sub>2</sub> or 0.045 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Except during startup and shutdown, NO<sub>x</sub> emissions shall not exceed 5.0 ppmvd @ 3% O<sub>2</sub> or 0.0062 lb/MMBtu, referenced as NO<sub>2</sub>. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Except during startup and shutdown, CO emissions shall not exceed 25 ppmvd @ 3% O<sub>2</sub> or 0.018 lb/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. SO<sub>x</sub> emissions shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. PM<sub>10</sub> emissions shall not exceed 0.005 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
20. VOC emissions shall not exceed 0.0014 lb/MMBtu, referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit
21. NH<sub>3</sub> emissions from the SCR system shall not exceed 10.0 ppmvd @ 3% O<sub>2</sub>. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Source testing to measure steady state NO<sub>x</sub>, CO and NH<sub>3</sub> emissions shall be conducted within 60 days of initial startup under this permit. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. Source testing to measure NO<sub>x</sub>, CO and NH<sub>3</sub> emissions during steady state operation shall be conducted at least once every 12 months. After demonstrating compliance on 2 consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rule 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

27. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 1081] Federally Enforceable Through Title V Permit
32. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> at least once during each month in which source testing is not performed. NO<sub>x</sub>, CO and O<sub>2</sub> monitoring shall be conducted utilizing a portable analyzer that meets District specifications. NH<sub>3</sub> monitoring shall be conducted utilizing gas detection tubes (Dräger brand or District approved equivalent). Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless it has been performed within the last month. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
35. If either the NO<sub>x</sub>, CO or NH<sub>3</sub> concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
36. All NO<sub>x</sub>, CO, O<sub>2</sub> and ammonia emission readings shall be taken with the unit operating at conditions representative of normal operation or under the conditions specified in the Permit to Operate. The NO<sub>x</sub>, CO and O<sub>2</sub> analyzer as well as the NH<sub>3</sub> emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Analyzer readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
37. Ammonia emissions readings shall be conducted at the time the NO<sub>x</sub>, CO and O<sub>2</sub> readings are taken. The readings shall be converted to ppmvd @ 3% O<sub>2</sub>. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
38. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, NH<sub>3</sub> and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent by volume and the measured NO<sub>x</sub>, CO and NH<sub>3</sub> concentrations corrected to 3% O<sub>2</sub>, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH<sub>3</sub> emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

39. The permittee shall maintain record of the following items: (1) date; (2) duration of each startup (hours); (3) duration of each shutdown (hours); (4) total start-up and shutdown durations per day (hour/day); (5) total start-up and shutdown durations per month (hours/month); (6) total startup and shutdown duration in a 12 consecutive month period; (7) heat input rate to the unit (MMBtu/month); and (8) total heat input rate to the unit in a 12 consecutive month period. [District Rule 2201, 4306 and 4320] Federally Enforceable Through Title V Permit
40. The owner or operator shall either obtain fuel receipts (such as a valid purchase contract, tariff sheet, or transportation contract) from the fuel supplier that certify that the gaseous fuel meets definition of natural gas (as defined in 40 CFR 60.41b) and the applicable sulfur limit (i.e., 1.0 gr-S/100 scf), or demonstrate that the combusted gas is provided from a PUC or FERC regulated source, or monitor the sulfur content within 60 days of initial startup and weekly thereafter. If the sulfur content is less than or equal to 1.0 gr/100 dscf for eight consecutive weeks, then the monitoring frequency shall be every six months. If the result of any six month monitoring demonstrates that the fuel does not meet the fuel sulfur content limit, weekly monitoring shall resume until compliance is demonstrated for eight consecutive weeks. [District Rule 4320, 40 CFR 60.45b(j), 60.49b(r)(2)] Federally Enforceable Through Title V Permit
41. For 40 CFR Part 60 Subpart Db purposes, NOx emissions shall not exceed 0.1 lb/MMBtu for low heat release units (70,000 Btu/hr-ft<sup>3</sup> of furnace volume or less) and 0.2 lb/MMBtu for high heat release units (greater than 70,000 Btu/hr-ft<sup>3</sup> of furnace volume) on a 30-day rolling average basis. NOx standard shall apply at all times including periods of startup, shutdown, or malfunction. The permittee shall maintain records of the furnace volume, which is defined as the volume bounded by the front furnace wall where the burner is located, the furnace side waterfall, and extending to the level just below or in front of the first row of convection pass tubes [40 CFR 60.44b(a), 60.44b(h), 60.44b(i)] Federally Enforceable Through Title V Permit
42. For the initial compliance test under 40 CFR Part 60 Subpart Db, NOx emissions shall be monitored for 30 successive steam generating unit operating days and the 30-day average emission rate shall be used to determine compliance with the NOx emission standard under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft<sup>3</sup> of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft<sup>3</sup> of furnace volume)). The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period. [40 CFR 60.46b(e)(1)] Federally Enforceable Through Title V Permit
43. Following the initial compliance test under 40 CFR Part 60 Subpart Db, the operator shall upon request determine compliance with the NOx standard under 40 CFR 60.44 (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft<sup>3</sup> of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft<sup>3</sup> of furnace volume)) through the use of a 30-day performance test. During periods when performance tests are not requested, NOx emissions data collected pursuant to §60.48b(g)(1) or §60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the NOx emission standards. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NOx emission data for the preceding 30 steam generating unit operating days. [40 CFR 60.46b(e)(4)] Federally Enforceable Through Title V Permit
44. The owner or operator shall monitor steam generating unit operating conditions and predict NOx emission rates as specified in a plan submitted pursuant to 40 CFR §60.49b(c) and approved by the District. [40 CFR 60.48b(g)(2)] Federally Enforceable Through Title V Permit
45. The owner or operator shall submit notification of the date of initial startup and the annual capacity factor at which the owner or operator anticipate to operate this unit. [40 CFR Part 60.49b(a)(3)] Federally Enforceable Through Title V Permit
46. The owner or operator shall submit the data from initial performance test to demonstrate compliance with 40 CFR Part 60 Subpart Db within 60 days after completing the initial test. [40 CFR 60.49b(b)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

47. The owner or operator shall develop and submit a plan, within 360 days of initial startup of the unit, to predict the hourly NO<sub>x</sub> emissions. The plan shall: (1) Identify the specific operating conditions to be monitored and the relationship between these operating conditions and NO<sub>x</sub> emission rates (i.e., ng/J or lbs/MMBtu heat input). Steam generating unit operating conditions include, but are not limited to, the degree of staged combustion (i.e., the ratio of primary air to secondary and/or tertiary air) and the level of excess air (i.e., flue gas O<sub>2</sub> level); (2) Include the data and information that the owner or operator used to identify the relationship between NO<sub>x</sub> emission rates and these operating conditions; and (3) Identify how these operating conditions, including steam generating unit load, will be monitored under §60.48b(g) on an hourly basis by the owner or operator during the period of operation of the affected facility; the quality assurance procedures or practices that will be employed to ensure that the data generated by monitoring these operating conditions will be representative and accurate; and the type and format of the records of these operating conditions, including steam generating unit load, that will be maintained by the owner or operator under §60.49b(g). If the plan is approved, the owner or operator shall maintain records of predicted nitrogen oxide emission rates and the monitored operating conditions, including steam generating unit load, identified in the plan. [40 CFR Part 60.49b(c)] Federally Enforceable Through Title V Permit
48. The owner or operator shall maintain records of the amount of fuel combusted during each day in this unit. [40 CFR 60.49b(d)(1)] Federally Enforceable Through Title V Permit
49. The owner or operator shall maintain records of the annual capacity factor on a monthly basis. The annual capacity factor shall be determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. [40 CFR 60.49b(d)(1)] Federally Enforceable Through Title V Permit
50. The owner or operator shall maintain records and submit a written report each calendar quarter to the District containing the following information for each steam generating unit operating day: (1) Calendar date; (2) The average hourly NO<sub>x</sub> and CO emission rates (expressed as NO<sub>2</sub>) (ppmvd @ 3% O<sub>2</sub> and lb/MMBtu heat input) measured or predicted; (3) The 30-day average NO<sub>x</sub> emission rates (lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days; (4) Identification of the steam generating unit operating days when the calculated 30-day average NO<sub>x</sub> emission rates are in excess of the NO<sub>x</sub> emissions standards under 40 CFR 60.44b (0.1 lb/MMBtu for low heat release units (i.e., 70,000 Btu/hr-ft<sup>3</sup> of furnace volume, or less), or 0.2 lb/MMBtu for high heat release units (i.e., greater than 70,000 Btu/hr-ft<sup>3</sup> of furnace volume)), with the reasons for such excess emissions as well as a description of corrective actions taken; (5) Identification of the steam generating unit operating days when the average hourly NO<sub>x</sub> and CO emission rates are in excess of the NO<sub>x</sub> and CO limits (startup, shutdown and steady state) in this permit, with the reason for such excess emissions as well as a description of corrective actions taken; (6) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; (7) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data; (8) Identification of "F" factor used for calculations, method of determination, and type of fuel combusted; and (11) A negative declaration when no excess emissions occurred. The report is due on the 30th day following the end of the calendar quarter. [District Rules 1080, 2201, 4305, 4306 and 4320, 40 CFR 60.49b(g), 40 CFR 60.49b(i), and 40 CFR 60.49b(w)] Federally Enforceable Through Title V Permit
51. The owner or operator shall maintain all records of required monitoring data and support information for a period of five years from the date of data entry and shall make such records available to the District upon request. [District Rules 1070, 2201, 4305, 4306, and 4320, and 40 CFR 60.49b(o)] Federally Enforceable Through Title V Permit
52. The owner or operator of an affected facility may submit electronic quarterly reports in lieu of submitting the written reports. The format of each quarterly electronic report shall be coordinated with the District. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of this permit was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the District to obtain their agreement to submit reports in this alternative format. [District Rule 1080 and 40 CFR 60.49b(v)] Federally Enforceable Through Title V Permit



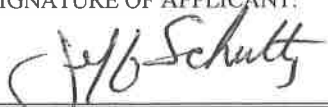
Appendix III  
Permit Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

## Permit Application For:

[ ] ADMINISTRATIVE AMENDMENT    [X] MINOR MODIFICATION    [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: ConAgra Foods	
2. MAILING ADDRESS:  STREET/P.O. BOX: 554 S. Yosemite Avenue  CITY: Oakdale STATE: CA 9-DIGIT ZIP CODE: 95361	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: 554 S. Yosemite Avenue CITY: Oakdale  14 ¼ SECTION T2S TOWNSHIP R10E RANGE	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS:	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Include permit no N-1976-29-0 into the current Title V permit.	
6. TYPE OR PRINT NAME OF APPLICANT: Jeff Schultz	TITLE OF APPLICANT: Plant Engg & Env Manager
7. SIGNATURE OF APPLICANT: 	DATE: 12/17/13 PHONE: (209) 840-1146 FAX: (209) 848-7387 EMAIL:

jeff.schultz@conagrafoods.com

### For APCD Use Only:

DATE STAMP: <b>RECEIVED</b>  DEC 20 2013  SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ 57 <sup>00</sup> CHECK#: 11577  DATE PAID: 12/19/2013  PROJECT NO: N-1133813 FACILITY ID: N-1976
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Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- ☐ SIGNIFICANT PERMIT MODIFICATION                      ☐ ADMINISTRATIVE  
☒ MINOR PERMIT MODIFICATION                                      AMENDMENT

COMPANY NAME: ConAgra Foods	FACILITY ID: N - 1976
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: ConAgra Foods	
3. Agent to the Owner:	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial **all** circles for confirmation):**

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
\_\_\_\_\_  
Signature of Responsible Official

12/19/13  
\_\_\_\_\_  
Date

Jeff Schultz  
\_\_\_\_\_  
Name of Responsible Official (please print)

Plant Engg & Env Manager  
\_\_\_\_\_  
Title of Responsible Official (please print)

## Appendix IV Emissions Change

## Emissions Change

Use of the proposed boiler under N-1976-29 will not result in an increase in facility's potential emissions since the boiler #4 under permit N-1976-4 will not be operated simultaneously with this unit.